



NEW YORK:  
45 Broadway  
32<sup>nd</sup> Floor  
New York, NY 10006  
P (212) 221-6900  
F (212) 221-6989  
McLellan.K@wssl.com

July 2, 2021

**VIA ECF**

The Honorable John G. Koeltl  
United States District Judge  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312  
(212) 805-0222

Re: Garmashov v. United States Parachute Association, Inc.  
Case No.: 1:21-cv-04917-JGK

Dear Judge Koeltl:

We have recently been retained to represent Defendant, United States Parachute Association, Inc., (“USPA”) in relation to the above-referenced matter. We write now, pursuant to Your Honor’s Individual Practices in Civil Cases, and on consent of Plaintiff, to respectfully request an extension of time to answer, move or otherwise respond to the Complaint, up to and including July 23, 2021.

Plaintiff served USPA with a copy of the Complaint on June 15, 2021. Accordingly, the current deadline for USPA to answer, move or otherwise respond is July 6, 2021. Plaintiff has consented to an extension up to and including July 23, 2021.

This is USPA’s first request for an extension. Thank you for your consideration of this letter-motion.

Very truly yours,

*/s/ Kenneth A. McLellan*

Kenneth A. McLellan

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Hon. John G. Koeltl  
July 2, 2021  
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cc: *VIA ECF ONLY*

Counsel for Plaintiff  
ALEX B. KAUFMAN, Esq.  
Hall Booth Smith, P.C.  
191 Peachtree Street, NE, Suite 2900  
Atlanta, GA 30303 -1775  
D: 404-586-6629  
C: 404-964-5587  
O: 404-954-5000 F: 404-954-5020  
[akaufman@hallboothsmith.com](mailto:akaufman@hallboothsmith.com)